

# **EXHIBIT 13**

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION

4 IN RE: NATIONAL ) MDL No. 2804  
5 PRESCRIPTION OPIATE )  
6 LITIGATION ) Case No.  
7 ) 1:17-MD-2804  
8 )  
9 THIS DOCUMENT RELATES TO ) Hon. Dan A.  
10 ALL CASES ) Polster  
11 )

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Monday, May 13, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
CONFIDENTIALITY REVIEW

Videotaped Deposition of JAMES E.  
RAFALSKI, held at Weitz & Luxenburg PC, 3011  
West Grand Avenue, Suite 2150, Detroit,  
Michigan, commencing at 9:20 a.m., on the  
above date, before Michael E. Miller, Fellow  
of the Academy of Professional Reporters,  
Registered Diplomate Reporter, Certified  
Realtime Reporter and Notary Public.

GOLKOW LITIGATION SERVICES  
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deps@golkow.com

1                   So you -- you came up with  
2       these five methodologies?

3           A.       Yes, sir.

4           Q.       Okay. And tell me -- tell me  
5       why you chose these five methodologies. I  
6       think you started to do it, but just go ahead  
7       and explain it to me.

8           A.       Well, because these are  
9       methodologies that were used by one or more  
10      companies in my report, during the time frame  
11      of my report. Each one of these were not  
12      invented by me, but they were actually used.

13          Q.       Okay. Can you -- let's start  
14      with the first one. Methodology A is maximum  
15      monthly trailing six-month threshold.

16                   Can you explain to me what you  
17      were trying to express here?

18          A.       Well, this is the Masters case  
19      methodology.

20          Q.       Okay.

21          A.       Or I shouldn't say methodology.  
22      This is their suspicious order system. So  
23      it's a rolling six-month, and it looks for a  
24      current month that exceeds the highest  
25      previous amount in the six months.